

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

In re:

GN INVESTMENTS, LLC

Debtor.

Chapter 11

Case No. 19-04262-SWD

**MOTION TO EXTEND TIME TO FILE OPPOSITION TO MOTION FOR AN ORDER
ESTABLISHING BAR DATE FOR FILING PROOFS OF CLAIM AND APPROVING
FORM AND MANNER OF SERVICE THEREOF**

The Official Committee of Unsecured Creditors of Najeeb A. Khan (the “Khan Committee”) files this Motion to Extend Time to File Opposition to Motion for an Order Establishing Bar Date for Filing Proofs of Claim and Approving Form and Manner of Service Thereof and states as follows:

1. On or about February 5, 2020, Kelly M. Hagan, the Chapter 11 Trustee, for this above captioned Debtor filed her *Chapter 11 Trustee’s Ex Parte Motion for an Order Establishing Bar Date for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof* (Rec. Doc. 147)(the “Motion”), wherein she asked the Court to set a Bar Date for the filing of proofs of claim against this estate pursuant to Fed. R. Bankr. P. 3003(c)(3).

2. The Committee is still evaluating the merits of the Motion but notes that the Trustee has filed it on an ex parte basis.

3. The Committee, through undersigned counsel, has been in contact with the Trustee and her counsel about its concerns with the Motion. The Committee is therefore asking this Court for additional time if it determines that it needs to file an opposition to the Motion or make additional changes to the Motion. The Committee is hopeful that any issue that it has may be resolved through internal discussions and/or further discussions with the Trustee.

4. Therefore the Committee is asking for additional time up to and including February 13, 2020 to file an opposition to the ex parte Motion should it determine that such an objection is warranted. The Committee will promptly notify this Court and the Trustee should its concerns be resolved making such an opposition unnecessary.

WHEREFORE, the Committee, for the reasons stated above, respectfully requests an extension of time up to and including February 13, 2020 to file an opposition to the *Chapter 11 Trustee's Ex Parte Motion for an Order Establishing Bar Date for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof* (Rec. Doc. 147) and for all other relief to which it is entitled in law and equity.

Dated: February 5, 2020

JONES WALKER LLP

/s/ Mark A. Mintz

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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2020, a copy of the foregoing document was filed electronically using the Court's CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Mark A. Mintz

Mark A. Mintz

